



U.S. Department of Energy

0059921

Office of River Protection

P.O. Box 450
Richland, Washington 99352

JUL 17 2003

03-ED-116

Mr. Michael A. Wilson, Program Manager
Nuclear Waste Program
State of Washington
Department of Ecology
1315 W. Fourth Avenue
Kennewick, Washington 99336

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EDMC

Dear Mr. Wilson:

COMMENTS FOR THE STATE OF WASHINGTON DEPARTMENT OF ECOLOGY'S
(ECOLOGY) PROPOSED MODIFICATION TO PART III, CHAPTER 10, WASTE
TREATMENT AND IMMOBILIZATION PLANT OF THE HANFORD FACILITY'S
DANGEROUS WASTE PERMIT

Reference: Ecology letter from M. A. Wilson to R. J. Schepens, ORP, K. A. Klein, RL, and
R. F. Naventi, BNI, "Draft Modification of Waste Treatment and Immobilization
Plant (WTP) Dangerous Waste Permit," dated May 21, 2003.

In the reference, Ecology issued a draft permit modification for review and comment. This draft
permit modification incorporates design information from multiple permit design packages and a
WTP specific definition for vendor information.

The U.S. Department of Energy, Office of River Protection (ORP) appreciates the opportunity to
comment on the draft permit conditions. The following comments were developed by ORP and
contractor staff, and discussed with Ecology staff on July 16, 2003:

Permit conditions III.10.E.9.c.vii and III.10.E.9.d.viii require submittal of system descriptions
related to tanks, system descriptions related to ancillary equipment, and system descriptions
related to leak detection systems, (including instrument control logic and narrative
descriptions), for incorporation into the Administrative Record. In the statement of basis
(Ecology Publication No. 03-05-002), Table 1, under Package LAW-002, Document No.
24590-LAW-3YD-20-00001, Revision 0, a System Description is identified for inclusion in
Appendix 9.3 of the permit, rather than inclusion in the administrative record per
III.10.E.9.c.vii. Also in Table 1, under Package PTF-005, Document No. 24590-PTF-3YD-
PWD-00001, Revision 0, a System Description is identified for inclusion in Appendix 8.3 of
the permit, rather than inclusion in the administrative record. These documents should be
incorporated into the administrative record, rather than enforceable provisions of the permit.

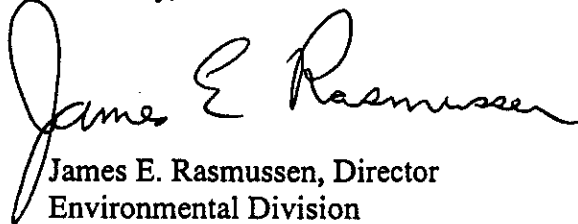
Mr. Michael A. Wilson
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If you have any questions, please contact Lori A. Huffman, Environmental Division,
(509) 376-0104.

Sincerely,



James E. Rasmussen, Director
Environmental Division

ED:LAH

cc: B. G. Erlandson, BNI
J. P. Henschel, BNI
S. L. Dahl, Ecology
T. Z. Gao, Ecology
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S. A. Thompson, FHI
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Administrative Record
Environmental Portal, LMSI